

8674 '00 MAR 29 A9:48

Food and Drug Administration
Dockets Management Branch (HFA-350)
Room 1061
5630 Fishers Lane
Rockville, MD 20852

RE : Docket No. 94P-0036, CFSAN 9727, Food Labeling: Trans Fatty Acids
in Nutrition Labeling

TO WHOM IT MAY CONCERN

We strongly object the FDA proposal on the expression of trans fatty acids declaration as saturated acids. We recommend that the trans fatty acids be declared as a separate line item under saturated fatty acids in the nutrition label. In addition we also recommend that the claim of "trans fat free" would not be associated with saturated fatty acids.

By definition, trans fat is completely different from saturated fat. Trans fat is defined as unsaturated fatty acid with trans configuration. Combining trans fat into saturated fat would mislead the consumers about the nature of the fatty acids. Although both fatty acids are considered as "heart-unhealthy", several scientific reports suggest that the effect of trans fat and saturated fat on biological system different. The effect of trans fatty acids on the serum lipoprotein profile is at least as unfavorable as that of the cholesterol raising saturated fatty acids, because they not only raise LDL cholesterol level, but also lower HDL cholesterol level (Mensink and Katan, 1990, Katan *et al.*, 1995). Ascherio *et al.* (1999) reported that trans fat raised LDL cholesterol as much as twice than that of saturated fat. Ascherio *et al.* (1996) also reported that during following up 734 coronary events were documented, including 505 non-fatal myocardial infraction and 229 death, no strong association was observed between intake of saturated fat and risk of coronary heart disease.

Based on the above findings, combining trans fat into saturated fat would not be suitable since trans fatty acid may cause stronger effect on the LDL cholesterol. Therefore we strongly request that information on trans fat and saturated fat should be provided in two separate lines.

Sincerely,



Erwady Gunawan



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